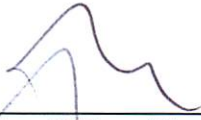

	Number: EA CRAD 30-01 Revision: Rev. 0 Effective Date: April 29, 2015
Contractor Assurance System - Criteria Review and Approach Document		
Authorization and Approval	 Director, Office of Environment, Safety and Health, EA-30 Date: April 29, 2015	 Director, Office of Nuclear Safety and Environmental Assessments, EA-31 Date: April 29, 2015

1.0 PURPOSE

Within the Office of Enterprise Assessments (EA), the Office of Environment, Safety and Health Assessments (EA-30) mission is to assess the effectiveness of those safety and emergency management systems and practices used by line and contractor organizations in implementing Integrated Safety Management; and to provide clear, concise, and independent evaluations of performance in protecting our workers, the public, and the environment from the hazards associated with Department of Energy (DOE) activities and sites.

In addition to the general independent oversight requirements and responsibilities specified in DOE Order 227.1, *Independent Oversight Program*, this criteria review and approach document (CRAD), in part, fulfills the responsibility assigned to EA in DOE Policy 226.1B., *Department of Energy Oversight Policy* to conduct independent oversight of contractor implementation of DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*, Attachment 1, Contractor Requirements Document.

A key to success is the rigor and comprehensiveness of our process; and, as with any process, we continually strive to improve and provide additional value and insight to field operations. Integral to this is our commitment to enhance our program. We continue to make CRADs available for use by DOE line and contractor assessment personnel in developing effective DOE oversight, contractor self-assessment, and corrective action processes; the current revision is available at:
<http://www.energy.gov/ea/criteria-review-and-approach-documents>.

2.0 APPLICABILITY

The following CRAD is approved for use by the Office of Nuclear Safety and Environmental Assessments (EA-31).

3.0 FEEDBACK

Comments and suggestions for improvements on this CRAD can be directed to the Director, Office of Environment, Safety and Health Assessments, at (301) 903-5392.

4.0 CRITERIA REVIEW AND APPROACH

OBJECTIVE

CAS.1: Site Contractor management has established a Contractor Assurance System (CAS) that includes assignment of management responsibilities and accountabilities and provides evidence to assure both DOE and the contractor's management that work is being performed safely, securely, and in compliance with all requirements; risks are being identified and managed; and that the systems of control are effective and efficient in accordance with the policy and key elements outlined in DOE Policy 226.1B, *Department of Energy Oversight Policy*; DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*, Attachment 1 Contractor Requirements Document (CRD); quality assurance requirements (as stated in 10 CFR 830, Subpart A, DOE Order 414.1D, *Quality Assurance*, or other applicable regulations); other applicable DOE directives; and contract terms and conditions.

CRITERIA

1. A CAS is established.
 - a. A CAS description is documented and approved by DOE.
 - b. Requirements of the CRD flow down to the subcontractors to ensure subcontractors' acceptable safety performance (DOE O 226.1B CRD 1).
 - c. CAS monitors and evaluates work and safety performance of contractor and subcontractor compliance with contract and facility safety requirements (DOE O 226.1B CRD 1).
 - d. Contractor management responsibilities and accountabilities are assigned and performed (DOE O 226.1B CRD 2.a).
 - e. CAS compiles and analyzes results of assurance processes to provide evidence of safe, secure, and compliant work (DOE O 226.1B CRD 2.a).
 - f. Personnel are selected and trained for effective performance of the CAS responsibilities (DOE O 226.1B CRD 2.b(3)(b)(3)).
2. Assessments are planned and conducted.
 - a. CAS identifies and schedules a suite of assessments that vary in depth and scope based on requirements and risk (DOE O 226.1B CRD 2.a).
 - b. Rigorous, risk-informed and credible self-assessment and feedback and improvement activities are performed and documented. Assessment programs must be risk-informed and appropriately cover potentially high consequence activities (DOE O 226.1B CRD 2.b(2)).
 - c. CAS includes a method to validate the effectiveness of assurance system processes by using third-party audits, peer reviews, independent assessments, effectiveness reviews, etc., (DOE O 226.1B CRD 2.b(1)).

3. A structured issues management and corrective action system is established.
 - a. The issues management system captures program and performance issues from many sources, and issues are appropriately categorized to ensure problems are evaluated, reported, and corrected (including compensatory actions when needed) on a timely basis (DOE O 226.1B CRD 2.b(3)).
 - b. For higher significance findings a documented casual factor analysis/evaluation, timely actions and plans to correct and prevent reoccurrence, tracking plans and actions to closure, and performing effectiveness reviews must be completed (DOE O 226.1B CRD 2.b(3)(b))¹.
4. Results of the CAS are effectively used to improve performance.
 - a. The CAS includes effective means of communicating issues and performance trends/analysis to managers to enable informed decisions and correction of negative performance/compliance trends (DOE O 226.1B CRD 2.b(3)(b)(5). Continuous feedback and improvement processes are established that solicit and use corrective action, worker feedback and lessons learned to improve work planning, hazards identification, program and process implementation (DOE O 226.1B CRD 2.b(5)).
 - b. The CAS provides timely communication of issues and performance trends to contractor management and the Contracting Officer and electronic access to assurance-related information. CAS provides evidence to assure DOE and contractor management that work is being performed safely, that risks are being identified and managed, and that control systems are effective (DOE O 226.1B CRD 2.b(4), 2.d)).
 - c. CAS establishes metrics (performance indicators) and targets, and performs trending and analysis to support appropriate, proactive decisions (DOE O 226.1B CRD 2.b(6)).

APPROACH

References:

DOE Policy 226.1B, *Department of Energy Oversight Policy*
 DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*
 10 CFR 830, Subpart A - Quality Assurance Requirements
 DOE O 450.2, *Integrated Safety Management*
 DOE Order 414.1D, *Quality Assurance*
 DOE O 210.2A, *DOE Corporate Operating Experience Program*
 DOE O 232.2 Admin Chg. 1, *Occurrence Reporting and Processing of Operations Information*
 DOE G 414.1-1B CRD, *Management and Independent Assessments Guide*
 DOE O 426.2 Admin Chg 1, *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*

Record Review:

- CAS approvals, directives, policies, program descriptions, procedures, instructions, guidance, Quality Assurance Plan, and contractual requirements.
- Integrated Safety Management System Description and most recent declaration.
- Assessment planning, scheduling, and risk-ranking process procedures; schedules.
- Evidence that the contractor requirements flow down to subcontracts and are evaluated for effective implementation by the contractor.
- Contractor assessment records including assessment activity schedules for independent, management, and other self-assessments and external reviews/inspections of the CAS and safety management programs and systems.

¹ The graded implementation of these corrective action processes based on categorization of issues is anticipated to meet quality assurance and integrated safety management principles.

- Records of processes that verify the effectiveness of the CAS in addition to assessments.
- Charters and minutes of meetings that evaluate issues, assign actions and resources.
- Field element assessments and oversight confirming CAS and assessment adequacy.
- Work packages related to facility activities for incorporation of lessons learned and feedback processes.
- Documented Safety Analysis and Technical Safety Requirements descriptions and requirements for assessment, safety management programs, and administrative controls.
- Issues management system description or procedures and access to database records.
- Reports of issues management status (open actions, extension history, trends).
- Operating Experience (OE) and Lessons Learned (LL) program description and records including evidence of OE/LL feedback used.
- Employee concerns program and differing professional opinion process documents and records.
- Documentation related to deficiencies and resolution (e.g., procedures, completed assessments, employee concern case files, occupational injury and illness reports, operational incident/event reports, critique minutes and occurrence reports, (sub-Occurrence Reporting Process System reports) deficiency reports, causal analyses and corrective action plans, verification/validation records, and effectiveness determinations).
- Evidence that lessons learned are disseminated to the work force, incorporated into training, work control planning, procedure revisions, and shared during work group meetings.
- Metric process descriptions and selection of recent reports.
- Trend analysis and performance indicator reports and evaluations, conclusions, and any related corrective actions.
- Training records for personnel leading and performing assessments and cause analysis, cognizant system engineers.

Interviews:

- CAS Manager
- Selected CAS staff
- Facility Manager
- Assessors
- Cause analysts
- Facility Training Manager
- Cognizant System Engineers for safety systems
- Operating experience/lessons learned coordinators
- Metrics coordinator or manager
- Training personnel
- Work Control Lead/planner for the facility
- Selected facility operational and support personnel

Observations:

- Facility issues management meetings (to evaluate issue management processes and indirectly evaluate organizational learning/safety culture)
- Meetings where senior management is apprised of performance results
- Ongoing assessment or review team meetings and field activities
- Event critiques
- Work activity “hot wash”
- Operational demonstration of issues management system